

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

1199SEIU UNITED HEALTHCARE
WORKERS EAST,

Petitioner,

-against-

PSC COMMUNITY SERVICES, NEW
PARTNERS, INC. D/B/A
PARTNERS IN CARE, *et. al.*

Respondents.

Case No.: 20-cv-3611 (JGK)

NOTICE OF MOTION

Please take notice herein that the undersigned shall move this Court before the Honorable John G. Koeltl, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on such date and at such time as the Court shall determine, for an Order granting the motion to intervene and to dismiss or stay on behalf of Mei Kum Chu, Sau King Chung, Qun Xiang Ling, Epifania Hichez, Carmen Carrasco, Seferina Acosta, and Dulce Herrera Palma (“Intervenors”).

WHEREFORE, Intervenors respectfully request that the motion to intervene and to dismiss or stay in the instant action be granted, together with such other and further relief as the Court may deem just and proper.

WHEREFORE, Intervenors also request that oral argument be permitted on the motion.

Dated: New York, New York
June 29, 2020

Respectfully Submitted

By: /s/
Michael Taubenfeld, Esq.
FISHER TAUBENFELD LLP
225 Broadway, Suite 1700

New York, NY 10007
Telephone: (212) 571-0700
Facsimile: (212) 505-2001

S. Tito Sinha
TAKEROOT JUTICE
123 William Street, 16th Floor
New York, NY 10038
Telephone: (646) 459-3032
Facsimile: (212) 619-0653